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VIA ECF

Honorable Judge Mary Kay Vyskocil
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Kumaran vs. Northland Energy Trading et al* 1:19-Cv-08345 (MKV-DCF)

SHORT LETTER EXTENSION (THANKSGIVING)

Dear Honorable Judge Mary Kay Vyskocil;

Pursuant to Local Rule 6.1 and Individual Rules 2.G and in light of the current Thanksgiving Holiday, and the current motions before the Court, Plaintiff Kumaran respectfully requests a short seven(7) days extension to file its reply to the Opposition to the Motion for Reconsideration. The current return date is November 30, 2020 based on the local rules, as Westerman filed their opposition early than the 14 days permitted. The requested filing date of December 7, 2020 is consistent with the original and existing briefing schedule under Local Rules for the motion. No prejudice will occur because of this scheduling as it still keep the motion along the anticipated briefing schedule under Local Rule 6.1.

Plaintiff filed a motion for reconsideration on November 16, 2020. In accordance with the briefing schedule set forth under Local Rule 6.1 Defendants opposition was due November 30, 2020 and Plaintiffs reply due on December 7, 2020. (within seven (7) days). Plaintiff respectfully requests consideration that for a *Pro-Se* a seven day window is very short turn around to reply to substantive law on trade secrets.

Good cause is also shown as this four (4) day weekend over Thanksgiving is typically a time with family and Plaintiff had not anticipated working to meet a November 30, 2020 deadline. Plaintiff asserts that Westerman filed their motion one week early, precisely for this reason, to prejudice Plaintiff in its response over the holiday weekend. In the interest of justice, Plaintiff respectfully requests the original time frame of Monday December 7, 2020 remains in place for its briefing schedule. In the alternative, Plaintiff seeks a reasonable three(3) days until Thursday December 3, 2020. Again Westerman have raised a spattering of new and impermissible arguments, which seek to prejudice Plaintiff in not having sufficient time to respond.

Further this motion is critical to injunctive relief and issues related to trade secrets as requested and a hasty filing would not permit proper briefing that Plaintiff is entitled to. In addition, the opposition consists of multiple new legal theories which require proper response. Plaintiff also has young children, and had personal commitments over this weekend that would need to canceled due to Westermans' early response which was designed to prejudice. In addition, Plaintiff is *Pro-Se* so typically needs reasonable time to address these motions.

The original return date of December 7, 2020 was the original return date of this motion and Plaintiff does not seek any longer extension. Plaintiff tried to reach Westerman prior to filing this letter, but they were most likely unavailable because of the Thanksgiving holiday.

Plaintiff thanks the Court in advance for a reasonable break over the holidays. Plaintiff wishes the Court a happy rest of the Thanksgiving weekend. Thank you for your consideration.

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Respectfully submitted,

//SSK//

Samantha Siva Kumaran